

FMC Corporation

Phosphorus Chemicals Division
PO Box 4111
Pocatello, Idaho 83205
(208) 236-8200

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Environmental Cleanup Office



October 16, 2001

Mr. John Iani
Regional Administrator
U.S. Environmental Protection Agency, Region 10
1200 Sixth Avenue
Seattle, WA 98101

Subject: Certification of Closure of Wastewater Treatment Unit (Waste Management Unit #12)
Astaris Idaho LLC., Pocatello, Idaho
EPA I.D. No. IDD 07092 9518

Dear Mr. Iani:

Astaris Idaho LLC completed closure of the Wastewater Treatment Unit (Waste Management Unit #12) at the Pocatello facility on August 17, 2001. Pursuant to the EPA-approved RCRA closure plan for the Wastewater Treatment Unit, enclosed please find the certification that the closure was completed in accordance with the closure plan. Documentation supporting the certification, the Closure Report (for) Wastewater Treatment Unit dated October 2001, is enclosed.

Astaris anticipates that a separate request will be forwarded to EPA Region 10 requesting a reduction in the RCRA financial assurance for the facility in recognition of completion of the closure of the Wastewater Treatment Unit. Please feel free to contact me at (208) 236-8658 should you have questions regarding this information.

Very truly yours,

A handwritten signature in black ink, reading "Rob J. Hartman".

Rob J. Hartman
FMC Corporation

Enclosures

cc: Andrew Boyd, EPA w/o enclosures
Linda Meyer, EPA w/ enclosures
Wallace Reid, EPA w/o enclosures ✓
Susan Hanson, Shoshone-Bannock Tribes w/ enclosures

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Ward A. Wolleson
Regulatory Analyst
J.R. Simplot Company
P.O. Box 912
Pocatello, Idaho 83204

Dear Mr. Wolleson:

A review of the October, 1987 performance tests conducted on the #400 phosphoric acid plant shows that additional information is needed to determine the adequacy of the test for determining compliance with the applicable regulations. The specific inadequacies are listed below:

1. Calculations

Procedures and calculations for determining the fluoride content are insufficient. There is no nomenclature for identifying purposes, thereby making it very difficult, if not impossible, to check the calculations. The origin of the process weight rate used in determining the equivalent P_2O_5 feed rate should be stated, including a description of the method to measure it. The origin of the dry gas meter factor should be documented.

2. Diagrams

Diagrams of the process, ventilation system, control equipment and sampling location/access should be included. Documentation is needed to verify the conformance with all EPA methods. Actual testing equipment layouts, diagrams and specifications must be supplied, such as operating capacity, range, precision and accuracy for each method used.

3. Operation Dates

New Source Performance Standards (NSPS) 40 C.F.R. 60.7 and 8 require startup dates be reported and that testing be performed within 180 days of startup or within 60 days of reaching the maximum production rate. Neither EPA or the state of Idaho has this information. Therefore, please provide startup date and date of reaching maximum production rate.

4. Methods

The absence of cyclonic flow was not verified.

No stack static pressure reading was included. Apparently, this was assumed to be zero but was not explained.

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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The data sheets indicate that the integrated sampling for gas analysis may have been done on different days from the actual fluoride sampling. This should be verified and explained.

5. Control Equipment

The control equipment parameters were recorded for only one run of the Davy McKee scrubber. A baseline of normal operation is important. If the control equipment operational parameters were recorded during the other runs of the performance test, they need to be included with the test report.

6. Report

Along with the information discussed above, the report should also state actual emission limitations and discuss their compliance status. A table of contents would also be helpful.

Please provide the above requested information by June 10, 1988. Upon receipt, a review of the performance test will be done by this office to determine compliance with the applicable standards. If you have questions regarding this matter, Mark Masarik can be reached at (208) 334-1450.

Sincerely,

Michael J. Schultz, Chief
Air Operations Section

cc: Mark Masarik, 100
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CONCURRENCES							
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SURNAME							
DATE							